

PERMIT ATTACHMENT E INSPECTION PLAN

E.1 INTRODUCTION

In accordance with the requirements of 40 CFR §§ 264.15, 264.174, and 264.602 the Permitted Units shall be inspected for malfunctions and deterioration, operator errors, and discharges that may be causing, or may lead to, a release of hazardous or mixed waste or hazardous waste constituents to the environment or a threat to human health. Inspections shall be of items including, but not limited to, monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment important to prevent, detect, and respond to environmental and human health hazards. Containers of hazardous and mixed waste stored at a Permitted Unit shall also be routinely inspected to assess, secondary containment, location with respect to incompatible wastes, and compatibility of waste with containers. Unit-specific inspection requirements for all units are found below.

A copy of this Permit Attachment shall be maintained at each Permitted Unit.

1. Hazardous Waste Handling Unit (HWHU),
2. Thermal Treatment Unit (TTU) (records in Building 6715),
3. Radioactive and Mixed Waste Management Unit (RMWMU),
4. Auxiliary Hot Cell Unit (AHCU), and
5. Each Manzano Storage Bunker (MSB, 37034, 37045, 37055, 37057 and 37118).
6. The Corrective Action Management Unit (CAMU) main office.

E.2 INSPECTION RECORDS

The Permittees shall conduct inspections and record the results on inspection forms. The inspection forms shall identify the items to be inspected, and at a minimum, must include the items or parameters specified for each of the permitted units as shown in Tables E-1 through E-6. The following information shall also be recorded on inspection forms.

1. Name of the inspector,
2. The date and time of inspection,
3. Notation of observations and results of the inspection, and
4. The date and nature of any repairs or remedial actions.

Inspection records for each Unit shall be maintained at the Facility for the active life of the Unit, except as provided by 20.4.1.501.A(5) NMAC, Permit Section 7.2.2 and Permit Attachment H (Post-Closure Care Plans for the Corrective Action Management Unit). Current calendar year inspection records for each Permitted Unit shall be maintained at that Unit. All other inspection records shall be maintained in the Operating Record.

E.3 REMEDIAL ACTION

A response indicating the condition of each item subject to inspection requirements shall be entered in the appropriate column on an inspection form. If any defects, deterioration, damage, release of hazardous or mixed waste or constituents, or potential hazards are discovered during

an inspection, the Permittees shall take corrective action in a timely manner upon discovery to ensure that the problem does not lead to an environmental or human health hazard or noncompliance with this Permit. Actions taken shall, as appropriate, include evaluation and removal of accumulated liquids from secondary containment, transfer of waste from a defective container to an appropriate container in good condition, and repair or replacement of nonfunctioning equipment or systems. If an inspection reveals that a non-emergency problem has developed, corrective action including repairs, maintenance, and replacement shall be completed as soon as practical to preclude further damage.

Corrective action taken (along with time, date, results, and other pertinent information) in response to conditions discovered during an inspection shall be recorded in the appropriate section of the inspection form on which the condition requiring corrective action was first noted or the first inspection form completed following implementation of the corrective action.

E.4 INSPECTION SCHEDULE AND REQUIREMENTS FOR PERMITTED UNITS

The schedules described in this section and indicated on Tables E-1 through E-6 shall be followed for the inspection of the Units noted in Section E.1 of this Permit Attachment.

E.4.1 Daily Inspection

During each day that hazardous wastes or mixed wastes are handled (e.g., containers are opened or moved) at a Permitted Unit the Permittees shall inspect:

1. The loading/unloading areas that were used, including waste handling equipment, and the containers loaded/unloaded;
2. Treatment areas that were used, including treatment equipment.

E.4.2 Weekly Inspection

During each week that hazardous waste or mixed waste management (including storage) occurs at a Permitted Unit the Permittees shall at least inspect once weekly: container storage, including container placement, integrity, sealing, labeling, dates of storage, condition of storage area (i.e., floors, walls), secondary containment (liquid waste), waste compatibility and container compatibility storage conditions.

E.4.3 Monthly Inspection

During each month that hazardous waste or mixed waste management occurs at a Permitted Unit the Permittees shall at least once inspect monthly:

1. Safety & Emergency Equipment, including spill control equipment, fire extinguishers, decontamination equipment, external communication systems, internal communication and alarm systems, and fire suppression systems;
2. Security devices, including the perimeter fence, gates and doors, warning signs, locks and tamper indication devices;
3. Unit operation and structural equipment, including the floors, walls, ceilings;

4. Treatment areas, including general conditions (floors, walls), and treatment equipment and tools.

E.5 INSPECTION PLAN FOR THE HAZARDOUS WASTE HANDLING UNIT

Specific items and areas that shall be inspected at the HWHU, and the inspection criteria and frequency are listed in Table E-1 of this Permit Attachment. The items listed in the subject Table shall be inspected in each HWMU waste management area.

| TABLE E-1 | | |
|--|---|--|
| Inspection Schedule for the Hazardous Waste Handling Unit | | |
| ITEM OR PARAMETER | INSPECTION CRITERIA | INSPECTION FREQUENCY |
| SAFETY AND EMERGENCY EQUIPMENT See Table D-4 in Permit Attachment D for additional information | | |
| Eye wash / safety shower | Operational, accessible, in good condition | Monthly |
| First-aid kit | Present and stocked | Monthly |
| Spill control and cleanup items | Present, quantities per inventory, and in good condition | Monthly |
| Self-contained breathing apparatus | Present and in good condition | Monthly |
| Personal protective equipment | Present in quantities per inventory, and in good condition | Monthly |
| Fire alarm pull station(s) | Present, accessible, and in good condition | Monthly |
| Fire alarm(s) | Present, appears to be in good condition | Monthly |
| Telephone(s) | Present and operational | Monthly |
| Fire extinguisher(s) | Present, charged, accessible, and in good condition | Monthly |
| Fire sprinklers and system | Present, appears to be in good condition, sprinklers not obstructed | Monthly |
| OPERATING AND STRUCTURAL EQUIPMENT Buildings 958, 959, 958B, and 958C | | |
| Building / storage area floor | Clean, no spills, cracks, or excessive wear | Weekly when and where wastes are managed. Monthly otherwise. |
| Building walls | Not leaking or spalling, in good condition | Weekly when and where wastes are managed. Monthly otherwise. |
| Building ceiling | Not leaking or spalling, and in good condition | Weekly when and where wastes are managed. Monthly otherwise. |

| TABLE E-1 Inspection Schedule for the Hazardous Waste Handling Unit | | |
|--|---|--|
| ITEM OR PARAMETER | INSPECTION CRITERIA | INSPECTION FREQUENCY |
| Building lights | Operational and in good condition | Weekly when and where wastes are managed. Monthly otherwise. |
| Shelves (Building 959 only) | Clean, in good condition, no accumulated leaks or spills | Daily when and where wastes are handled. Weekly otherwise. |
| Secondary containment | Free of liquids, good condition (i.e., no cracks, excessive wear) | Daily when and where wastes are handled. Weekly otherwise. |
| Loading and unloading areas | Good condition, safe working surface, no cracks, no spills | Daily when and where wastes are handled. Monthly otherwise. |
| Waste handling equipment | Good condition, in good repair, operational | Daily when and where wastes are handled. Monthly otherwise. |
| Waste transfer pump | Present, operational, and in good condition | Prior to use, Monthly otherwise. |
| Storm water retention pond | Good condition, adequate freeboard, outlet not obstructed, no evidence of release of hazardous or mixed waste | Weekly |
| SECURITY DEVICES | | |
| Fence | Present and in good condition | Monthly |
| Warning signs | Present, legible, and in good condition | Monthly |
| Gates and doors | Present, operational, in good condition | Monthly |
| Locks | Present, operational, in good condition | Monthly |
| CONTAINERS | | |
| Integrity | Good condition (i.e., no bulging, leaks, corrosion, or deterioration) | Weekly |
| Closed | Correct lid/cover placement (i.e., properly closed and sealed) | Weekly |
| Labeling | Correct information, correct location, legible | Weekly |
| Storage Conditions | Waste compatible with container, container located with compatible wastes | Weekly |
| Location | Correct aisle space, stable stacking | Weekly |

E.6 INSPECTION PLAN FOR THE THERMAL TREATMENT UNIT

The Permittees shall perform inspections of the Thermal Treatment Unit (TTU) in accordance with the schedule and requirements in Table E-2.

| TABLE E-2 | | |
|--|--|--|
| Inspection Schedule for the Thermal Treatment Unit | | |
| ITEM OR PARAMETER | INSPECTION CRITERIA | INSPECTION FREQUENCY |
| SAFETY AND EMERGENCY EQUIPMENT | | |
| See Table D-6 in Permit Attachment D for additional information | | |
| Eye wash and safety shower | Operational, accessible, in good condition | Monthly |
| First-aid kit | Present and stocked | Monthly |
| Personal protective equipment | Present in quantities per inventory, and in good condition | Monthly |
| Spill control and cleanup items | Present, accessible, quantities per inventory, in good condition | Monthly |
| Fire alarm pull station(s) | Present, accessible, and in good condition | Monthly |
| Fire alarm(s) | Present, appears to be in good condition | Monthly |
| Public address system | Operational | Monthly |
| Telephone(s) | Present and operational | Monthly |
| Fire extinguisher(s) | Present, charged, accessible, and in good condition | Prior to treatment. Monthly otherwise |
| OPERATING AND STRUCTURAL EQUIPMENT | | |
| Waste transfer pump | Present, operational, and in good condition | Prior to use |
| Waste transfer tubes | Free of apparent leaks and in good condition | Prior to use |
| Burn pan | Present, free of apparent leaks, and in good condition | Prior to treatment. Monthly otherwise. |
| Burn pan lid | Operational and in good condition | Prior to treatment. Monthly otherwise. |
| Burn cage | Present and in good condition | Prior to treatment. Monthly otherwise. |
| Burn cage door | Operational and in good condition | Prior to treatment. Monthly otherwise. |
| Steel-lined concrete pad | No cracks and in good condition | Prior to treatment. Monthly otherwise. |
| Filter element | Present, free of tears or holes, and in good condition | Monthly |
| Rain catch tank | Free of apparent leaks and in good condition | Monthly |
| Area condition | Free of combustible materials and weeds and in good condition | Prior to treatment. Monthly otherwise. |

| TABLE E-2 Inspection Schedule for the Thermal Treatment Unit | | |
|---|---|--|
| ITEM OR PARAMETER | INSPECTION CRITERIA | INSPECTION FREQUENCY |
| Red warning beacons | Present and operational | Prior to treatment. Monthly otherwise. |
| Water spigot and hose | Present, operational, and in good condition | Prior to treatment. Monthly otherwise. |
| Burner control warning bell | Operational | Prior to treatment. Monthly otherwise. |
| SECURITY DEVICES | | |
| Fence | Present and in good condition | Monthly |
| Warning signs | Present, legible, and in good condition | Monthly |
| Gates | Present, operational, in good condition | Monthly |
| Locks | Present, operational, in good condition | Monthly |

E.7 INSPECTION PLAN FOR THE RADIOACTIVE AND MIXED WASTE MANAGEMENT UNIT

The Permittees shall perform inspections of the Radioactive and Mixed Waste Management Unit (RMWMU) in accordance with the schedule and requirements in Table E-3.

| TABLE E-3 Inspection Schedule for the RMWMU | | |
|---|--|-----------------------------|
| ITEM OR PARAMETER | INSPECTION CRITERIA | INSPECTION FREQUENCY |
| SAFETY AND EMERGENCY EQUIPMENT See Table D-8 in Permit Attachment D for additional information | | |
| Eye wash / safety shower | Operational, accessible, in good condition | Monthly |
| First-aid kit | Present and stocked | Monthly |
| Spill control and cleanup items | Present, accessible, quantities per inventory, in good condition | Monthly |
| Personal protective equipment | Present in quantities per inventory, and in good condition | Monthly |
| Fire alarm pull station(s) | Present, accessible, and in good condition | Monthly |
| Fire alarm(s) | Present, appears to be in good condition | Monthly |
| Telephone(s) | Present and operational | Monthly |

| TABLE E-3 Inspection Schedule for the RMWMU | | |
|--|---|---|
| ITEM OR PARAMETER | INSPECTION CRITERIA | INSPECTION FREQUENCY |
| Fire extinguisher(s) | Present, charged, accessible, and in good condition | Monthly |
| Fire sprinklers and system | Present, appears to be in good condition, sprinklers not obstructed | Monthly |
| OPERATING AND STRUCTURAL EQUIPMENT | | |
| Building / storage area floor | Clean, no spills, cracks, or excessive wear | Weekly when wastes are managed. Monthly otherwise. |
| Building walls | Not leaking or spalling, in good condition | Weekly when wastes are managed. Monthly otherwise. |
| Building ceiling | Not leaking or spalling, and in good condition | Weekly when and where wastes are managed. Monthly otherwise. |
| Building lights | Operational and in good condition | Weekly when and where wastes are managed. Monthly otherwise. |
| Loading and unloading areas | Good condition, safe working surface, no cracks, no spills | Daily when and where wastes are handled. Monthly otherwise. |
| Waste handling equipment | Good condition, in good repair, operational | Daily when and where wastes are handled. Monthly otherwise. |
| Treatment area | Good condition, clean, uncluttered, no spills | Prior to treatment. Monthly otherwise. |
| Treatment equipment | Good condition (i.e., no releases or deterioration); or present if in storage | Daily when and where wastes are treated. Prior to use for consumables and items that have been stored. Monthly otherwise. |
| Storm water retention pond | Good condition, adequate freeboard, outlet not obstructed, no evidence of release of hazardous or mixed waste | Weekly. |
| SECURITY DEVICES | | |
| Fence | Present and in good condition | Monthly |
| Warning signs | Present, legible, and in good condition | Monthly |
| Gates and doors | Present, operational, in good condition | Monthly |
| Locks | Present, operational, in good condition | Monthly |
| CONTAINERS | | |
| Integrity | Good condition (i.e., no bulging, leaks, corrosion, or deterioration) | Weekly. |
| Closed | Correct lid/cover placement (i.e., properly closed and sealed) | Weekly. |
| Labeling | Correct information, correct location, legible | Weekly. |

| TABLE E-3 Inspection Schedule for the RMWMU | | |
|--|--|--|
| ITEM OR PARAMETER | INSPECTION CRITERIA | INSPECTION FREQUENCY |
| Secondary Containment (liquid waste) | Adequate volume, free of liquids, good condition (i.e., no cracks, excessive wear) | Daily when and where wastes are handled. Weekly otherwise. . |
| Storage Conditions | Waste compatible with container, container located with compatible wastes | Weekly. |
| Location | Correct aisle space, stable stacking | Weekly. |

E.8 INSPECTION PLAN FOR THE AUXILIARY HOT CELL UNIT

The Permittees shall perform inspections of the Auxiliary Hot Cell Unit (AHCU) in accordance with the schedule and requirements in Table E-4. The items listed in Table E-4 shall be inspected in each AHCU waste management area.

In order to reduce the radiation exposure to levels as low as reasonably achievable (ALARA), the Permittees may conduct alternative inspections of the storage silos. When necessary to reduce radiation exposure for ALARA requirements, instead of inspecting the silos directly, the Permittees may visually inspect waste containers before they are placed in the silos and when they are removed from the silos. The visual inspection may be conducted from a safe distance or remotely via camera to maintain ALARA conditions for personnel.

| TABLE E-4 Inspection Schedule for the Auxiliary Hot Cell Unit | | |
|--|--|-----------------------------|
| ITEM OR PARAMETER | INSPECTION CRITERIA | INSPECTION FREQUENCY |
| SAFETY AND EMERGENCY EQUIPMENT | | |
| See Table D-10 in Permit Attachment D for additional information | | |
| Eye wash / safety shower | Operational and in good condition | Monthly |
| First-aid kit | Present and stocked | Monthly |
| Spill control and cleanup items | Present, quantities per inventory, and in good condition | Monthly |
| Personal protective equipment | Present in quantities per inventory, and in good condition | Monthly |
| Fire alarm pull station(s) | Present, accessible, and in good condition | Monthly |
| Fire alarm(s) | Present, appears to be in good condition | Monthly |
| Telephone(s) | Present and operational | Monthly |

| TABLE E-4 Inspection Schedule for the Auxiliary Hot Cell Unit | | |
|--|--|---|
| ITEM OR PARAMETER | INSPECTION CRITERIA | INSPECTION FREQUENCY |
| Fire extinguisher(s) | Present, charged, accessible, and in good condition | Monthly |
| Fire sprinklers and system | Present, appears to be in good condition, sprinklers not obstructed | Monthly |
| OPERATING AND STRUCTURAL EQUIPMENT | | |
| Building / storage area floor, tops of silo covers | Clean, no spills, cracks, or excessive wear | Weekly when wastes are managed. Monthly otherwise. |
| Building walls | Not leaking or spalling, in good condition | Weekly when wastes are managed. Monthly otherwise. |
| Building ceiling | Not leaking or spalling, and in good condition | Weekly when wastes are managed. Monthly otherwise. |
| Building lights | Operational and in good condition | Weekly when wastes are managed. Monthly otherwise. |
| Loading and unloading areas | Good condition, safe working surface, no cracks, no spills | Daily when and where wastes are handled. Monthly otherwise. |
| Waste handling equipment | Good condition, in good repair, operational | Daily when and where wastes are handled. Monthly otherwise. |
| Treatment area | Good condition, clean, uncluttered, no spills | Prior to treatment. Monthly otherwise. |
| Treatment equipment | Good condition (i.e., no releases or deterioration) | Daily when and where wastes are treated. Prior to use for consumables. Monthly otherwise. |
| SECURITY DEVICES | | |
| Warning signs | Present, legible, and in good condition | Monthly |
| Doors | Present, operational, in good condition | Monthly |
| Locks | Present, operational, in good condition | Monthly |
| CONTAINERS | | |
| Integrity | Good condition (i.e., no bulging, leaks, corrosion, or deterioration) | Weekly |
| Closed | Correct lid/cover placement (i.e., properly closed and sealed) | Weekly |
| Labeling | Correct information, correct location, legible | Weekly |
| Secondary Containment (liquid waste) | Adequate volume, free of liquids, good condition (i.e., no cracks, excessive wear) | Daily when and where wastes are handled. Weekly otherwise. |
| Storage Conditions | Waste compatible with container, container located with compatible wastes | Weekly |

| TABLE E-4 | | |
|--|--------------------------------------|-----------------------------|
| Inspection Schedule for the Auxiliary Hot Cell Unit | | |
| ITEM OR PARAMETER | INSPECTION CRITERIA | INSPECTION FREQUENCY |
| Location | Correct aisle space, stable stacking | Weekly |

E.9 INSPECTION PLAN FOR THE MANZANO STORAGE BUNKERS

The Permittees shall perform inspections of the Manzano Storage Bunkers (MSB) in accordance with the schedule and requirements in Table E-5.

| TABLE E-5 | | |
|--|---|---|
| Inspection Schedule for the Manzano Storage Bunkers | | |
| ITEM OR PARAMETER | INSPECTION CRITERIA | INSPECTION FREQUENCY |
| SAFETY AND EMERGENCY EQUIPMENT | | |
| See Table D-12 in Permit Attachment D for additional information | | |
| Portable eye wash | Operational, accessible, in good condition | Monthly |
| First-aid kit | Present and stocked | Monthly |
| Spill control and cleanup items | Present, quantities per inventory, accessible, in good condition | Monthly |
| Personal protective equipment | Present in quantities per inventory, and in good condition | Monthly |
| Smoke detector and external light | Present, appears to be in good condition | Monthly |
| Fire extinguisher | Present, charged, accessible, and in good condition | Monthly |
| OPERATING AND STRUCTURAL EQUIPMENT | | |
| Bunker floor | Clean, no spills or excessive wear | Weekly when wastes are managed. Monthly otherwise. |
| Bunker walls | Not leaking or spalling, in good condition | Weekly when wastes are managed. Monthly otherwise. |
| Bunker ceiling | Not leaking or spalling, and in good condition | Weekly when wastes are managed. Monthly otherwise. |
| Bunker lights | Operational and in good condition | Weekly when wastes are managed. Monthly otherwise. |
| Loading and unloading areas | Good condition, safe working surface, no spills | Daily when and where wastes are handled. Monthly otherwise. |
| Waste handling equipment | Good condition, in good repair, operational | Daily when and where wastes are handled. Monthly otherwise. |
| SECURITY DEVICES | | |
| Warning signs | Present, legible, and in good condition | Monthly |
| Doors | Present, operational, in good condition | Monthly |
| Locks | Present, operational, in good condition | Monthly |
| CONTAINERS | | |
| Integrity | Good condition (i.e., no bulging, leaks, corrosion, or deterioration) | Weekly |
| Closed | Correct lid/cover placement (i.e., properly closed and sealed) | Weekly |
| Labeling | Correct information, correct location, | Weekly |

| TABLE E-5 Inspection Schedule for the Manzano Storage Bunkers | | |
|--|--|--|
| ITEM OR PARAMETER | INSPECTION CRITERIA | INSPECTION FREQUENCY |
| | legible | |
| Secondary Containment (liquid waste) | Adequate volume, free of liquids, good condition (i.e., no cracks, excessive wear) | Daily when and where wastes are handled. Weekly otherwise. |
| Storage Conditions | Waste compatible with container, container located with compatible wastes | Weekly |
| Location | Correct aisle space, stable stacking | Weekly |

E.10 INSPECTION PLAN FOR THE CORRECTIVE ACTION MANAGEMENT UNIT

E.10.1 Inspection, Maintenance, and Repair Activities and Frequencies

The CAMU shall be routinely inspected during the post-closure care period as discussed in the following sections. The CAMU systems associated with the containment cell that will require inspection and maintenance/repair during the post-closure care period include, but are not limited to: (1) the final cover; (2) surface-water diversion structures; (3) the LCRS; (4) the VZMS; and (5) the perimeter security fence, security signs, and gate locks. Inspection and maintenance of all of these systems shall be performed throughout the post-closure care period in accordance with the schedule in Table E-6. Inspections shall be performed on a regularly scheduled basis to ensure the integrity and proper functioning of the waste containment cell and final cover, surface water diversion structures, the LCRS, the VZMS, and the perimeter fence, security signs and gate locks. Maintenance activities are addressed in more detail in Permit Attachment H.

E.10.2 Final Cover System Inspection

The final cover shall be inspected on a quarterly basis. Cover inspections shall note, in writing, deep-rooted plants (with roots at least 8 ft deep at maturity), such as shrubs and trees, by identifying such species; whether there is any settlement of the cover surface in excess of 6 inches; whether animal intrusion burrows in excess of 4 inches in diameter or burrows of species able to burrow 6 ft or deeper are present; erosion of the cover soil in excess of 6 inches deep; contiguous areas with no vegetation in excess of 200 square feet; and any other conditions that may impact the cover's integrity and performance.

The final cover shall also undergo vegetation monitoring quarterly until the vegetative cover is successfully established according to the following criteria:

1. Total percent foliar coverage equals 20 percent (i.e., 20 percent of the land surface is covered with living plants versus 80 percent bare surface area);
2. Of the 20 percent total foliar coverage, 50 percent or greater comprises native perennial species, and 50 percent or less comprises annual species; and

3. No contiguous bare spots greater than 200 square feet (approximately 14 by 14 feet) are present.

If these criteria are met, it shall be concluded that the native community is successfully established on the cover. After the native community is successfully established, full biological inspections shall be conducted annually.

E.10.3 Storm-Water Diversion Structures Inspection

The storm-water diversion structures shall be inspected on a quarterly basis to verify structural integrity and to ensure adequate performance. Inspections shall note, in writing, whether there is any erosion of the channels or sidewalls in excess of 6 inches deep and whether there is any accumulation of silt greater than 6 inches deep or debris that blocks more than one-third of the channel width.

E.10.4 LCRS Inspection

As described in Section A.7.3.1 of Permit Attachment A, the LCRS shall be inspected on a quarterly basis for the presence of leachate using the LCRS pump. For inspection purposes, the LCRS pump shall be manually activated on at least a quarterly basis and on a schedule consistent with the inspection and maintenance schedule for the LCRS outlined in Table E-6 of this Permit Attachment. When the pump is manually activated, leachate will be removed from the sump until the LCRS pump experiences cavitation. At this point the pump will be deactivated and leachate removal will cease. When the pump is manually activated and no leachate is generated a video camera inspection shall be performed to determine whether the pump is experiencing cavitation due to an insufficient leachate level or whether the pump has malfunctioned. If the pump has malfunctioned, the cause of the malfunction shall be determined, and the pump replaced or repaired as necessary. The pump assembly may be removed and properly stored until needed.

E.10.5 VZMS Inspection

During quarterly monitoring events (see Table E-6 of this Permit Attachment), the VZMS components shall be inspected. The inspection shall note, in writing, the condition of the components including protective casings, access covers and doors, instrumentation access boxes, compression caps, locks, and electronic monitoring systems.

E.10.6 Security Fence Inspection

The fence, gates, and warning signs shall be inspected on a quarterly basis. The inspections shall document, in writing, the condition of the fence, including fence wires, posts, gates, gate locks, and warning signs, and note whether there is any excessive accumulations of wind-blown plants and debris that would obscure warning signs, block access to the CAMU containment cell, or would interfere with any waste management activities or with any of the VZMS components or monitoring of any kind.

**Table E-6
CAMU Post-Closure Inspection and Maintenance/Repair Schedule**

| CAMU System to be Inspected | Inspection Parameters | Inspection Frequency | Maintenance/Repair Implementation | Maintenance/Repair Frequency |
|----------------------------------|--|-----------------------|---|--|
| Final Cover System | Existence of invasive plants or plants with the potential for forming deep roots (at least 8 ft deep at maturity) | Quarterly | Physically remove or otherwise eliminate the invasive or deep-rooting plant | Within 60 days of identification or as soon as seasonal conditions are most favorable for eliminating the plants. |
| | Settlement of cover surface in excess of 6 inches | | Repair cover system damage that exceeds prescribed limits, relocate animals if possible and repair burrows | Within 60 days of discovery of needed repairs ^b |
| | Animal intrusion burrows in excess of 4 inches in diameter or burrows that appear to be of species able to burrow 6 ft or greater) | | | |
| | Erosion of cover soil in excess of 6 inches deep | | Revegetate barren areas that exceed prescribed limits | Within 60 days of discovery of needed repairs or as soon as possible if seasonal conditions are not appropriate within 60 days |
| | Contiguous areas of no vegetation >200 ft ² | | | |
| Final Cover System | Full biological inspection, including: Approximate percentage vegetative coverage (actively photosynthesizing) Approximate percentage native vegetation of the total vegetative cover Main plant species growing on the CAMU cover and the approximate percentage of the cover populated by each species. | Annually ^a | Remove plants, revegetate barren areas, relocate animals if possible and repair burrows, augment soil and/or reseed per biologist recommendations | Follow schedule above for each item. |
| Storm-Water Diversion Structures | Channel or side-wall erosion in excess of 6 inches deep | Quarterly | Repair erosion that exceeds prescribed limits | Within 60 days of discovery of needed repairs ^b |
| | Accumulations of silt in excess of 6 inches deep | | Remove silt and debris accumulations that exceed prescribed limits | |
| | Debris that blocks more than 1/3 of channel width. | | | |

| Table E-6 CAMU Post-Closure Inspection and Maintenance/Repair Schedule | | | | |
|--|--|-----------------------------|--|--|
| CAMU System to be Inspected | Inspection Parameters | Inspection Frequency | Maintenance/Repair Implementation | Maintenance/Repair Frequency |
| LCRS | Leachate in sump | Quarterly ^c | Manually activate pump/inspect for leachate collection | Quarterly |
| | Pump | Quarterly | Maintain/repair pump | Within 60 days of discovery of needed repairs ^b |
| | Plumbing | | Maintain/repair plumbing | |
| VZMS | Protective casings Access covers and doors Instrumentation access boxes Compression caps | Quarterly | Maintain/repair protective casings, access covers and doors, instrumentation access boxes, and compression caps | Within 60 days of discovery of needed repairs ^b |
| | Locks | | Clean/replace locks | |
| | Electronic monitoring systems | | Maintain calibration and proper operating condition of electronic monitoring systems | |
| | Aboveground VZMS components | | Ensure aboveground VZMS components are protected from weather | |
| | Monitoring equipment (pump, tubing, gauges, valves, etc.) in need of repair/maintenance | | | |
| Security Fence | Presence of wind-blown plants and debris | Quarterly | Remove wind-blown plants and debris | Within 60 days of discovery of needed repairs ^b |
| | Condition of fence wires, posts, gates, gate locks, and warning signs | | Repair broken wire sections and posts Repair and oil gates Clean or replace locks Repair or replace warning signs | |
| Safety and Emergency Equipment See Table D-14 in Permit Attachment D for additional information | Spill control materials, including sorbent material, brooms and shovels are present, accessible, and in good condition | Monthly | Repair or replace | As soon as possible, in accordance with Section E.3 of this Permit Attachment. |
| | Fire extinguisher is present, charged, accessible, and in good condition | | | |
| | Portable eyewash station is operational and in good condition | | | |

^a This inspection will be conducted quarterly until the vegetative cover is successfully established and annually thereafter.

^b Maintenance/repairs shall be performed as necessary, based upon the results of inspections.

^c The LCRS pump and plumbing shall be maintained/repared based upon the results of quarterly inspections.

CAMU Corrective Action Management Unit.

ft² Square foot (feet).

LCRS Leachate Collection and Removal System.

VZMS Vadose Zone Monitoring System